

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:) CASE NO: 11-46219-399 Chapter 13
PAUL EDWARD TYLER)
MICHELLE LYNN TYLER) Trustee's Objection to Confirmation
Debtor(s)) Original confirmation hearing
set for Aug 24, 2011 10:00 AM

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

1. Proposed plan payment does not constitute debtor's best effort to repay creditors. 11 U.S.C. Secs. 1325(a)(3) & (b)(1)(B)
2. 2016(b) conflicts with Statement of Financial Affairs #9.
3. A. RE #1 PLAN DOES NOT GUARANTEE \$48,747 REQUIRED BY B22C.
B. 5B INCLUDES AUTO PURCHASED OVER 910 DAYS BEFORE FILING.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

KLW-221

Copy served on the following either through the Court's ECF system or by ordinary mail on July 14, 2011 :

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/s/ John V. LaBarge, Jr.

John V LaBarge Jr
Chapter 13 Trustee
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